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January 12, 2024

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Averbach et al. v. Cairo Amman Bank*, 19-cv-00004-GHW-KHP

Dear Judge Parker:

Pursuant to this Court's December 12, 2023 Scheduling Order, the parties write to provide the Court with a joint update on the parties' positions regarding: (1) the use of plaintiff profiles and (2) the scope of discovery related to CAB's forthcoming declaration. The parties are continuing to work to prepare a joint submission regarding summary judgment briefing, and respectfully request a brief adjournment until Tuesday, January 16, 2024 to do so.

1. Plaintiff Profile Forms

On January 10, 2024, the parties held a meet and confer to discuss Plaintiffs' draft template for a Plaintiff Profile Form (PPF). The parties agree that PPFs should be completed.

During the meet and confer, CAB advised Plaintiffs that the format and substance of the PPFs Plaintiffs provided it on December 12, 2023, are acceptable, subject to certain modifications. Plaintiffs were amenable to those modifications in principle, subject to CAB providing them with the revised redline of the PPFs.

CAB has agreed to provide Plaintiffs with proposed edits in writing early next week.

Plaintiffs believe the PPFs can be completed before summary judgment briefing begins. Plaintiffs maintain this will provide CAB with adequate time to evaluate the case for settlement purposes should its anticipated summary judgment motion on liability be denied.

CAB proposes that the Court set a deadline for the completion of the forms, so that they can be used to facilitate the valuation of the case for settlement as early as possible.



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2. Discovery Related to CAB's Declaration Regarding Palestinian Authority Payments

CAB's deadline to provide Plaintiffs with the declaration referenced in the December 12, 2023 Minute Order was extended to January 15, 2024. ECF 237.

In accordance with the Court's Order, the parties will meet and confer after CAB provides Plaintiffs with the declaration, and the parties will provide a supplemental joint update to the Court by January 25.

* * *

Plaintiffs have consented to CAB filing this letter on both parties' behalf.

Best regards,

/s/ Samantha Chaifetz

Samantha Chaifetz

Cc: All Counsel of Record via ECF